1 JONATHAN O. PENA, ESQ. 2 CA Bar ID No. 278044 Peña & Bromberg, PLC 3 2440 Tulare St., Suite 320 4 Fresno, CA 93721 Telephone: 559-412-5390 5 Fax: 866-282-6709 6 info@jonathanpena.com Attorney for Plaintiff 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 Case No. 1:21-cv-00103-SKO Glenda Prichard, 12 STIPULATION AND ORDER FOR EXTENSION OF TIME Plaintiff, 13 VS. (Doc. 15) 14 Kilolo Kijakazi, Acting Commissioner of Social Security, 15 16 Defendant. 17 18 19 20 21 IT IS HEREBY STIPULATED, by and between the parties through their 22 respective counsel of record, with the Court's approval, that Plaintiff shall have a 23 62-day extension of time, from November 19, 2021 to January 20, 2022, for 24 Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All 25 other dates in the Court's Scheduling Order shall be extended accordingly. 26 This is Plaintiff's first request for an extension of time. Good cause exists 27 for this extension. Counsel has recently received a greater number of Answers and 28

Certified Administrative Records from defendant in cases in this district, and the

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1	three other California Districts, each of which require settlement negotiations or		
2	merit briefing. Counsel has a greater than usual number of merit briefs due in		
3	November and December 2021. Thus, Counsel is requesting an extension through		
4	January 20, 2022 to accommodate the number of cases due. For the week of		
5	November 15, 2021, Counsel has nine merit briefs, several reply and settlement		
6	letters. Counsel also has 11 administrative hearings before the Office of Hearings		
7	Operations. For the month of December 2021, Counsel has 20 merit briefs		
8	scheduled due, seven of which are due within 7 days of the current deadline. In		
9	addition, Counsel has numerous reply briefs, settlement letters and EAJA motions		
10	due in the short month of December 2021.		
11	Counsel has also received an increase in the number of AC denials which		
12	require a review for possible filing in US District Court. Lastly, Counsel has end		
13	of the year business reviews to conduct as the CEO of Peña & Bromberg, PC.		
14	Due to the increase in certified administrative records being filed by		
15	defendant, Counsel for Plaintiff has a larger than usual number of briefs due for the		
16	months of November and December 2021.		
17	Compounding the issue of an increased number of merit briefs due, Counsel		
18	has preplanned vacation days for the Thanksgiving and Christmas holidays.		
19	Counsel respectfully requests the Court granted the requested extension.		
20	Counsel for the Plaintiff does not intend to further delay this matter.		
21	Defendant does not oppose the requested extension. Counsel apologizes to the		
22	Defendant and Court for any inconvenience this may cause.		
23			
24	Respectfully submitted,		
25	Dated: November 8, 2021 PENA & BROMBERG, ATTORNEYS AT LAW		
26			
27	By: /s/ Jonathan Omar Pena		
28	JONATHAN OMAR PENA		

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1		Attorneys for Plaintiff
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3		
4	Dated: November 9, 2021	PHILLIP A. TALBERT Acting United States Attorney
5		DEBORAH LEE STACHEL
6		Regional Chief Counsel, Region IX
7		Social Security Administration
8		
9		By: */s/ Marcelo N. Illarmo Marcelo N. Illarmo
10		Special Assistant United States Attorney
11		Attorneys for Defendant
12		(*As authorized by email on November 9, 2021)
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ORDER

Based upon the foregoing stipulation of the parties (Doc. 15), and for good cause shown (Fed. R. Civ. P. 16(b)(4)), IT IS HEREBY ORDERED, that Plaintiff shall have an extension of time, to and including January 20, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 14) shall be extended accordingly.

IT IS SO ORDERED.

Dated: November 10, 2021 /s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE